

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

LARAE BETRAND,
Defendant.

CRIMINAL NO. ELH-21-23

**(Conspiracy to Commit Wire Fraud,
18 U.S.C. §§1343 & 1349); Aggravated
Identity Theft, 18 U.S.C. § 1028(A);
Aiding and Abetting, 18 U.S.C. § 2)**

INFORMATION

COUNT ONE

(Wire Fraud Conspiracy)

The United States Attorney for the District of Maryland charges that:

At all times relevant to this Indictment:

1. Defendant **LARAE BETRAND** (“**BETRAND**”) was a resident of Maryland.

Manner and Means of the Conspiracy and the Scheme and Artifice to Defraud

2. It was part of the conspiracy and scheme and artifice to defraud that the conspirators, would and did use the names, social security numbers, and other personal identifying information of various individual victims, without their consent, to obtain fraudulent Supplemental Nutrition Assistance Program (“SNAP”) benefits from the Maryland Department of Human Resources (DHR).

3. It was further part of the conspiracy that **BETRAND** and others used the fraudulently obtained SNAP benefits to purchase consumer goods for the conspirators’ own use.

The Charge

4. From on or about January 29, 2019, and continuing until on or about March 19, 2020, in the District of Maryland, the defendant,

LARAE BETRAND,

conspired with others known and unknown to the Grand Jury, to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud financial institutions, businesses and individual victims, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises and, for the purpose of executing the scheme, caused to be transmitted by means of wire communication in interstate and foreign commerce certain signals and sounds, in violation of Title 18, United States Code, Section 1343.

18 U.S.C. § 1343 & 1349

18 U.S.C. § 2

COUNT TWO
(Aggravated Identity Theft)

The United States Attorney for the District of Maryland further charges that:

On or about October 13, 2019, in the District of Maryland, the defendant,

LARAE BETRAND,

did, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person; to wit, the defendant used and attempted to use the means of identification of M.S. to conduct a fraudulent retail transaction during and in relation to wire fraud conspiracy under 18 U.S.C. § 1349, as charged in Count One.

18 U.S.C. § 1028A(a)(1) and (c)(5)
18 U.S.C. § 2

Jonathan F. Lenzner / PBB

Jonathan F. Lenzner
Acting United States Attorney

Date: February 17, 2021